

Anti-Bribery & Corruption Policy

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1. Purpose

The purpose of this policy is to set guidelines to conduct business affairs in an honest and ethical manner, set out the responsibilities of Company and all individuals who work for it in observing and upholding the Company's position on bribery and corruption, and provide information and guidance to those individuals working for or having business relationship with Company on how to recognize and deal with bribery and corruption issues.

2. Policy

This policy applies to all companies of Gatronova group, covering the following aspects:

- Bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage through 'improper performance'.
- Improper performance happens when a person fails to act in good faith, impartially or in accordance with a position of trust.
- Corruption is the abuse of Entrusted Power for personal gain.

Bribery and corruption are prohibited and criminalized across the world and can expose the Company and its personnel to substantial fines and even imprisonment.

The Company has a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships.

Any use of bribery, kickbacks or any form of payment in cash / kind to obtain any undue business related or otherwise gainful benefit for the Company shall be strictly prohibited. Bribery not only violates the code of conduct, it violates the law. The use of Company funds or assets for any unlawful, improper or unethical purpose shall be prohibited.

The directors, officers, employees and third parties acting on behalf of the Company shall be prohibited from offering or accepting, directly or indirectly, any bribe to any employee, official, or agent of any government, political parties, commercial entity, or individual in connection with the business or activities of the Company.

The Company shall not use illegal payments, bribes, facilitation payments, kickbacks or other questionable inducements to influence any business

transaction. All Company's personnel shall conduct business in a legal and ethical manner and shall avoid making payments that may be perceived to be improper while conducting business.

Any Employee receiving offer of illegal payments, bribes, facilitation payments, kickbacks or other questionable inducements to influence any business transaction shall immediately inform to Group Head of Human Resources Department for taking necessary action.

Any employee who becomes aware of receiving / offer of receiving illegal payments, bribes, facilitation payments, kickbacks or other questionable inducements by another employee to influence any business transaction shall immediately inform to Group Head of Human Resources Department for taking necessary action.

The Company's employees shall also refer to other policies that may be applicable such as Ethics and Business Principles and Code of Conduct of the Company.